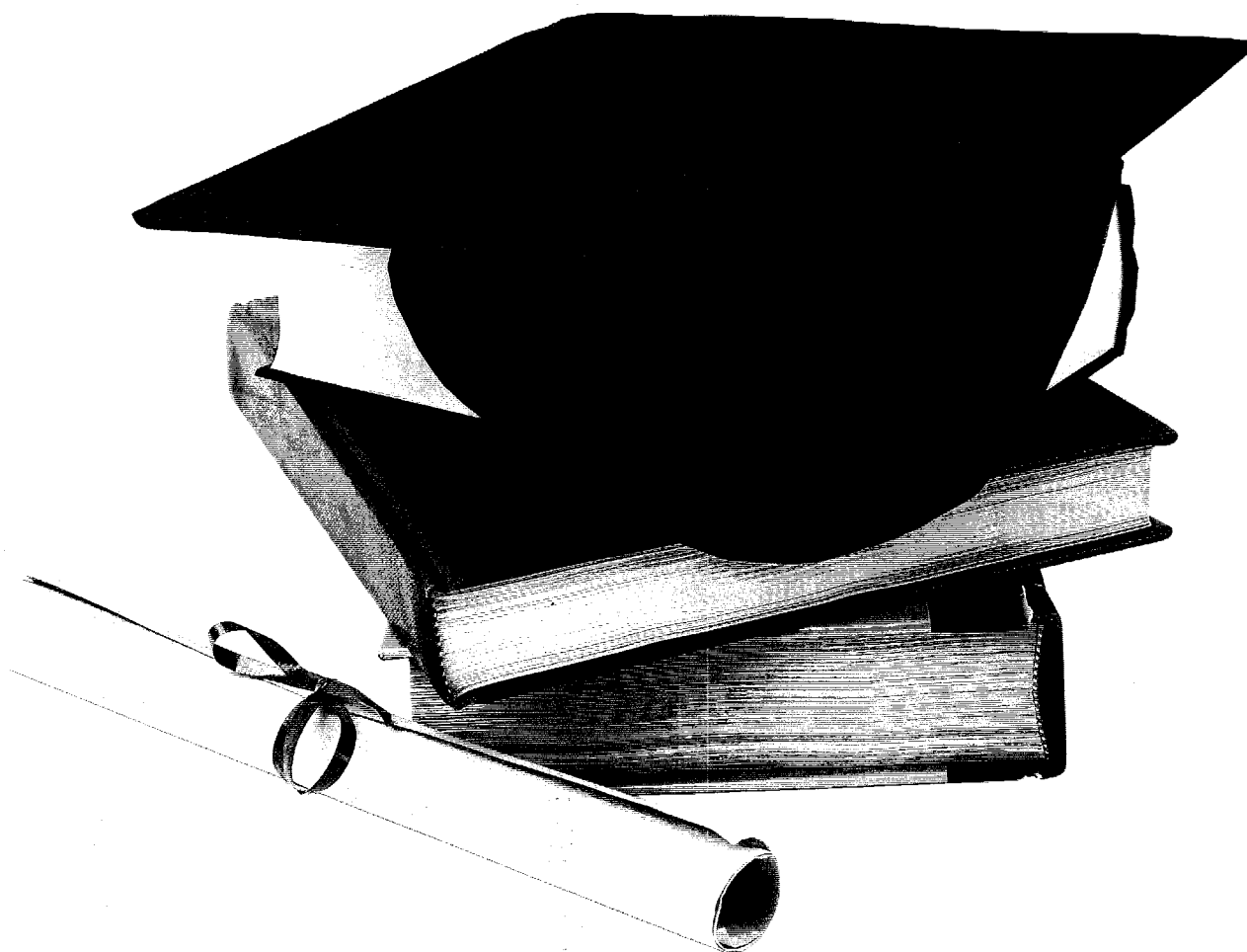# Census – Type Audit
# of Student Enrollment

District of Columbia Public Schools

Final Report
As of October 8. 2002
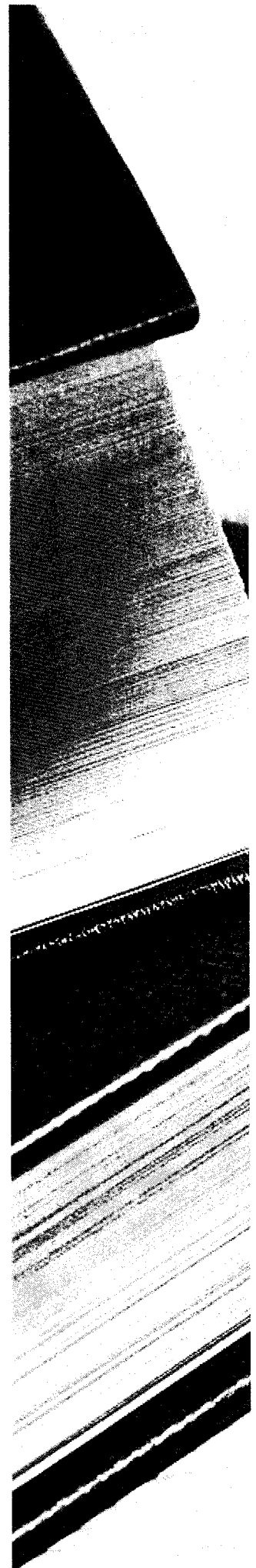
TCBA

THOMPSON, COBB, BAZILIO & ASSOCIATES, PC

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Executive Summary

Thompson, Cobb, Bazilio & Associates, PC (TCBA) was retained by the State Education Office of the District of Columbia (the SEO) to conduct a full census-type audit of the October 8, 2002, student enrollment for the District of Columbia Public Schools (DCPS) and public charter schools. In addition to the enrollment verification, TCBA reviewed each student file to ensure that it contained proper documentation to support residency, special education, and English language proficiency designations. This report presents the results of the census-type audit for only DCPS; public charter schools are reported separately.

This was the second year that a 100% verification of student enrollment and residency files was conducted. As shown in Chart 1, the annual DCPS enrollment continues to decline, while the number of special education students placed in non-DCPS schools (Tuition Grant) continues to increase.

Chart 1: **4-Year Enrollment Trend (DCPS and Tuition Grant Students – per DCPS)**
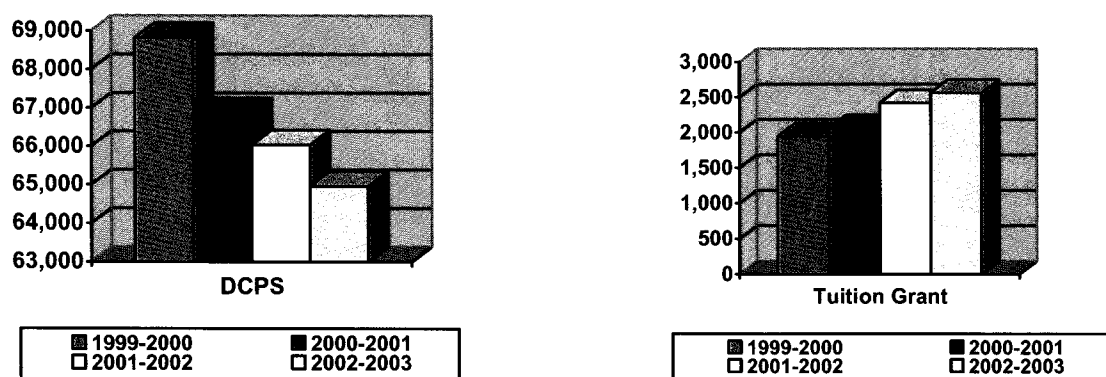
The SY 2002 – 2003 Official Membership Report published by DCPS reflects a total of 67,522 students as of October 8, 2002, consisting of 64,959 students enrolled in pre-school, pre-kindergarten, kindergarten, grades 1 through 12, and non-grade level programs in DCPS and 2,563 special education students whose tuition for enrollment in other schools is paid with funds available to DCPS (Tuition Grant). The results of the census-type audit verified:

- 64,272 students enrolled in pre-school, pre-kindergarten, kindergarten, grades 1 through 12, and non-grade level programs in DCPS, and

- 2,420 special education students whose tuition for enrollment in other schools is paid with funds available to DCPS.

Of the 64,272 students verified as enrolled in DCPS programs, other than Tuition Grant, we found:

- 119 students present and attending at October 8, 2002, who were not in SIS

- 903 students for whom residency verification was inadequate

- 57 students who are paying non-resident tuition

- 7,509 students who receive special education services

- 4,792 LEP/NEP students

Enrollment

Our student count as of October 8, 2002 (excluding Tuition Grant) was 64,272 without regard to residency and 63,369 for students with verified residency.

Table 1 shows the enrollment count for DCPS students compared to the Membership Report. DCPS established criteria through various memoranda and guidelines for determining and reporting membership. Our examination was conducted with reference to these procedures as they applied to DCPS. *(See Table 2 for the breakdown of students' residency status.)*

Table 1: **Enrollment Comparison**

DCPS	Students Present	Absent and Counted	Total	Membership Report	Difference
Total Enrollment	56,036	8,236	64,272	64,959	(687)
Enrollment with Verified Residency	55,368	8,001	63,369	64,959	(1,590)

Residency

Residency verification continues to be an issue in the District. Of the 64,272 students found to be enrolled, there were 903 students for whom proof of residency provided to the auditors was inadequate or unavailable. However, for the majority of these students, SIS showed that proper residency documentation had been obtained. This signifies weaknesses in both the procedures for obtaining valid proof as well as the procedures for maintaining accurate student information.

We reviewed the District Residency Verification Form (Residency Form) for every student included in the census, to the extent available. During the initial review, we identified students for whom we had not seen adequate residency documentation. The schools were given an opportunity to provide the missing information. Table 2 summarizes the final results of the residency review. The "Not Verified" column includes students for whom we were not provided the necessary documentation to make a determination of residency status. (See Attachment 9.)

Table 2: **Residency***

	Resident	Non-Resident Paying Tuition	Non-Resident Not Paying Tuition	Not Verified	Total*
DCPS Schools	63,316	53	2	901	64,272

*Residency documentation was not reviewed for Tuition Grant students; therefore, they are not included in Table 2.

This report includes both quantitative enrollment data as well as qualitative observations. Only those students who are District residents, or pay tuition, are considered properly enrolled. Therefore, the enrollment data is presented in two ways — enrollment without regard to residency and enrollment only for students who have properly proven residency or who pay tuition. The quantitative data is presented in the following attachments:

Attachments

1. Summary of Audited Enrollment by School Type and Grade and Summary of Students for Whom Enrollment and Residency were Verified By School Type and Grade

2. Audited Enrollment by School and Grade

3. Summary by School Type and Grade: Audited Enrollment vs. Reported Enrollment

4. Enrollment by School and Grade: Audited Enrollment vs. Reported Enrollment

5. Not Used

6. Summary of Students for Whom Enrollment and Residency were Verified By School and Grade

7. Summary of Students for Whom Enrollment and Residency were Verified by School Type and Grade: Audited Enrollment vs. Reported Enrollment

8. Summary of Students for Whom Enrollment and Residency were Verified by School and Grade: Audited Enrollment vs. Reported Enrollment

9. Summary of Residency Verification by School

10. Summary of Funding Levels for Students with IEPs, including Students for Whom Residency was not Verified

11. Summary of LEP/NEP Students by School, including Students for Whom Residency was not Verified

12. Not Used

13. Summary of Funding Levels for Students with IEPs for Whom Enrollment and Residency were Verified

14. Summary of LEP/NEP Students with Verified Residency

The qualitative findings are discussed in detail in the Observations section of this report. Many of the anomalies that we discovered during the census-type audit can be addressed through a few comprehensive recommendations. Some of these recommendations were made last year; based on our review this year, we believe they bear repeating.

Residency

1. Verify residency through an automated matching of information available in systems throughout the District, e.g. Office of Tax and Revenue, Department of Human Services, Unemployment Compensation, Division of Motor Vehicles, etc. While the residency of all students may not be verifiable through a cross-check, this process will substantially reduce the number that must be verified manually. Further, it would reduce the burden on parents and school administrators. The DCPS Residency Office supports this recommendation.

2. Outsource the process. The primary flaw in the residency process is that the schools are not motivated to turn away students - just the opposite. Higher enrollment equals higher funding. In addition, residency verification is perceived as an added burden on the school administrations, so at some schools it may not receive the required attention. Outsourcing the process would be a means to eliminate the possible conflict of interest and reduce the burden on the schools.

3. If current law permits and privacy issues are resolved, change the directive to require schools to maintain copies of the residency proof provided by the parent. This will allow for a more thorough audit of adherence to the regulations.

The first two recommendations can be combined whereby the majority of students would be verified through an automated crosscheck with the remainder of the verifications being outsourced. This combination will increase the reliability of the process and reduce the overall cost.

Special Education

According to staff in the DCPS Division of Special Education, some of the discrepancies noted in the Tuition Grant confirmations and SIS records could be a result of there being two different systems, SIS and SETS. Although the systems interface, it is possible for a student to be assigned in SETS to a different school than in SIS. Also, SIS/SETS is not always updated on a timely basis to reflect placement changes. A Special Education Counselor is assigned to each non-DCPS school to monitor the student assignments. While substantial progress has been made, the discrepancies suggest that the monitoring process needs to continue to be strengthened. We were also told that the Special Education counselor approves each invoice before payment is made to the school. Again, the number of discrepancies suggests that this may not be occurring on a regular basis. We recommend the following:

1. Update SIS/SETS to provide a current, accurate accounting of student placements;

2. Have regular (no less than monthly) reconciliation reports of SIS and SETS data reviewed by the Special Education Director;

3. Conduct a complete audit of the last six months of invoices submitted by and paid to non-DCPS schools to ensure that the students for whom DCPS is paying tuition have been properly placed and are being properly billed for;

4. Conduct a thorough review of the processes and controls over tracking, monitoring, and payment of students placed in non-DCPS schools;

5. Develop a process with adequate checks and balances to ensure that invoices are reviewed on a monthly basis, prior to payment, to verify that the invoices accurately reflect the student placements; and

6. Develop an internal audit process whereby the students attending the non-DCPS schools are physically verified and reconciled to SETS.

In addition to the data errors in the systems, we found numerous mathematical and procedural errors on the IEPs, which are discussed in the Observations section of this report. We recommend that a training program be developed which will instruct appropriate personnel on the proper procedures for preparing an IEP. As part of the approval process, the service hours should be reviewed for accuracy.

System Maintenance

We recommend that the DCPS Special Education Division assign a task force, or contract outside support, to perform a 100% verification and validation of the data in SETS for students attending DCPS schools and Tuition Grant schools. It is virtually impossible to accurately maintain a system that is populated with inaccurate data.

Additional training and standard practices are needed for SIS. We found that the information in SIS is not standardized. Each school is responsible for maintaining SIS; however, there is no consistency. Attendance is not recorded every day by every school; addresses are not accurate; admission, withdrawal, and transfer dates are not always the actual dates; residency codes do not reflect the residency verification status, etc. Without standard data parameters, SIS cannot be relied upon to provide accurate, consistent information. There are policies, but the school staff need to be trained on those policies and the training needs to be reinforced. Although DCPS provides regular training, the high turnover in administrative personnel makes this an ongoing process. We recommend that DCPS have designated SIS trainers who will visit the schools regularly to ensure that staff is trained and procedures are followed.

In addition to training, there needs to be accountability for the accuracy of the data. This has been a finding in each of the previous enrollment audits. While there has been improvement, there continue to be numerous data errors. The majority of data is input in SIS at the school level, which means that approximately 200 people do data entry with no one verifying the accuracy. The MIS department processes the data and maintains the system, but the MIS staff are not responsible for data accuracy. Without accountability and oversight and better coordination between MIS and the schools, the reliability of SIS data will continue to be questionable. This will hold true for the new system being developed. Although a new system may have more data verification capability, it will still be only as reliable as the data it contains.

It is the nature of these reports to bring attention to discrepancies and improper adherence to policies. However, we would like to commend those schools that had no or few enrollment or residency issues remaining after the resolution process, signifying good administrative practices and cooperation with the census process.

We appreciate the cooperation we have received from the SEO and DCPS personnel.

Glossary

Absent – Not in attendance on the day of the count. Students arriving during the physical count were not recorded as absent.

Audit Period – The census-type audit was conducted between October 15, 2002 and January 10, 2003, including the resolution period.

Census-type Audit – Determination of: the number of students enrolled in pre-school, pre-kindergarten, kindergarten, grades 1 through 12, and non-grade level programs in DCPS and special education students whose tuition for enrollment in other schools is paid with funds available to DCPS; the number of students who are District residents; the number of tuition-paying non-resident students; and the number of special education and English minority students as of October 8, 2002, based upon a physical headcount of students and review of applicable student records. This was not an audit conducted in accordance with generally accepted auditing standards.

Enrollment Classifications – For purpose of the audit, students were classified as:

> Enrolled – A student was included in the enrollment count if he was:
>
> - In the October 8, 2002, SIS data and present during the physical count
>
> - In the October 8, 2002, SIS data and absent on the day of the physical count but documentation provided evidence of enrollment and attendance
>
> - Not in the October 8, 2002, SIS data but present during the count and documentation provided evidence of enrollment on October 8.
>
> Not Enrolled – A student was in the October 8, 2002, SIS data, but documentation provided evidence that the student had withdrawn or stopped attending or was attending another school.
>
> Not Resolved – Student was in the October 8, 2002, SIS data and absent on the day of the physical count, but documentation did not provide clear evidence of enrollment and attendance.

Enrollment Date – All data presented in this report is as of October 8, 2002.

LEP/NEP – Limited English Proficiency/No English Proficiency

Membership Report – Report issued by DCPS detailing student count entitled "SY 2002 – 03 Official Membership Report October 8, 2002".

Residency Classifications –

> Verified – During the initial on-site file review, the student had a completed District Residency Verification Form, or applicable waiver, on file that had been properly approved. Otherwise, adequate proof of residency was provided during the resolution period.
>
> Not Verified – There was no District Residency Verification Form on file or the form was incomplete, and adequate proof was not provided during the resolution period.

Resident Student – A student enrolled in a DCPS school who is 1) a minor whose parent, guardian, or other primary caregiver resides in the District of Columbia or 2) an adult who resides in the District of Columbia.

Resolution Period – Period after completion of the headcount and file reviews during which principals were provided an opportunity to resolve any outstanding issues.

School Types –

- Alternative: Special educational program that provides instruction to students under court supervision or on short- and long-term suspension from a regular DCPS academic program.

- Elementary – Preschool through grade 8

- Middle – Grades 5 through 8

- Junior High – Grades 7 through 9

- Senior High – Grades 9 through 12

- Special Education: separate school providing specialized services for students identified as having disabilities, as defined by law.

Special Education Tracking System (SETS) – System of record for placement and services provided to special education students. SETS interfaces with SIS through bridge software.

Student Information System (SIS) – The system of record for student enrollment and attendance. SIS is used as the basis for the Membership Report.

Tuition Grant - Special education students whose tuition for enrollment in other schools is paid with funds available to DCPS. These schools include non-public day and residential programs as well as public schools in surrounding counties serving District children under the care of D.C. Child and Family Services.

Uniform Per Student Funding Formula – Formula used to determine annual operating funding for DCPS pursuant to the School reform Act of 1995, as amended, and the Uniform Per Student Funding Formula for Public Schools and Public Charter School Act of 1998.

Weekly Service Hours – The number of hours of specialized education provided to a student each week in accordance with the Individual Education Plan (IEP).

Procedures

To perform the census, we obtained the SIS download of active students on October 8, 2002 ("Enrollment Data"). We also obtained a download of SETS data as of October 8th, including weekly service hours and funding level.

Enrollment

Our procedures for determining the number of students enrolled and attending public schools were as follows:

1. Using the Enrollment Data, we organized each school by homeroom. There are no standard policies throughout the District with regard to the use of homerooms; therefore, schools use different groupings for reporting the counts, (i.e. homeroom, first period, group advisory, etc). For purposes of this report, all count groupings are referred to as homerooms.

2. A complete packet was developed for each school. This packet consisted of separate envelopes for each homeroom containing a Homeroom Roster of the students in the classroom, a set of nametags with barcodes (Student Roll Call Form), and Student Addition Forms.

3. Upon arrival at each homeroom, we asked the teacher to call out names from the Homeroom Roster as we simultaneously issued the student a bar-coded nametag.

4. A physical head count of all students present in class was taken. Upon completion of the roll call, we reconciled the number of students physically counted to the number from the roll call (taking into account both absent and newly added students). The teacher signed the Roster confirming that the count took place.

5. The purpose of conducting the roll call was to identify the following populations of students:

   a. Students present on the day of the count who were shown as enrolled in the school's records on October 8, 2002;

   b. Students shown by the school's records to be enrolled on October 8, 2002, but who were absent on the day of the count;

   c. Students shown by the school's records to be enrolled on October 8, 2002, but who, in fact, withdrew or transferred out prior to October 8, 2002; and

   d. Students present on the day of the count who were not shown in the records as enrolled on October 8, 2002.

Students in categories b. through d. required the following additional procedures:

   e. For students noted as absent, we reviewed the teachers' roll book and/or the attendance reports in SIS for documentation that students absent on the day of the count had a history of attendance. In accordance with DCPS policy, a student is considered active if she attends class within the previous 20 school days. For purpose of our audit, we reviewed the history of attendance from the start of school through the date of our count. If the student had been absent for 20 consecutive days, we did not include her in the count. Also, if a student had not been absent for a full 20 days prior to October 8th but had no record of attendance after October 8th, we considered that student to have effectively withdrawn prior to October 8th.

f. For students noted as withdrawn or transferred out, we reviewed the information in SIS to determine the dates of withdrawal or transfer and a record of attendance prior to October 8, 2002. We also reviewed transfer/withdrawal and enrollment forms.

g. For students in the classroom who were not included in the Enrollment Data, we had the teacher or student fill out a Student Addition Form (which includes the same information as the name tags) and also added the student to the Homeroom Roster. The information provided on the Student Addition Form was reconciled with the enrollment form and SIS (attendance and student master record), and we determined whether to add the student to the October 8 enrollment based upon attendance.

After reviewing the data collected, we determined the total number of students who were present and for whom acceptable evidence of membership on October 8, 2002, was obtained. Students for whom acceptable alternate evidence was not provided were not included in the count totals. Students not included in the count include:

- Students included in the Enrollment Data for whom sufficient evidence was not provided by the school to support either the enrollment or transfer status;

- Students included in the Enrollment Data who had never reported or had no record of attendance for the 20 consecutive school days prior to October 8, 2002, based on the school records and/or discussions with teachers and principals; or

- Students with unresolved duplicate student identification numbers (ID) issues generated from a computer-assisted search of the October 8, 2002 Enrollment Data.

File Reviews

We conducted a review of every student file to determine whether documentation existed to support residency, special education and English proficiency designations.

1. For residency verification, we reviewed the District Residency Verification Form to determine whether the appropriate proofs of residency had been obtained. Because the schools had been directed not to keep copies of proofs, only the residency verification form could be reviewed. This limited our audit procedures to determining if the form was in the file and if it a) identified that the proper number and types of proof had been reviewed, b) was complete, and c) was signed by a school official. A Waiver Form completed by the DCPS Student Residency Office was also accepted as proof of residency.

2. For special education verification, we reviewed the front page of the Individual Education Plan (IEP) to determine those students for whom an assessment of special needs had been performed. From the IEP, we documented total weekly service hours and compared the service hours to those listed in SETS. For students for whom the service hours on the IEP did not agree with SETS, we notified the DCPS Special Education Division and obtained agreement that the IEP hours were correct.

3. For English proficiency verification, we reviewed the Language Minority Student Enrollment Report prepared by the Bilingual Office of DCPS.

Tuition Grant

We obtained the October 8, 2002, SIS database of students in Tuition Grant schools. We sent letters to each of the schools requesting enrollment information as of October 8, 2002. Based upon the confirmation responses and resolution documentation provided by the DCPS Special Education Division, we determined the number of students enrolled at each school.

Resolution Process

After completing the initial accumulation of data, we held an exit conference with the principal of each school to review the results. We provided each principal with a report of potential discrepancies and provided him/her an opportunity to resolve the items. Each report listed students for whom there were discrepancies in the following categories:

- **Duplicate Students**— A student was identified in DCPS or a public charter school with the same Student Identification Number.

- **Enrollment**— There was not sufficient evidence to determine if the student was enrolled and attending at October 8, 2002.

- **New Student**— A student was physically present during the count who was not included in the October 8, 2002, enrollment data, but there was not sufficient evidence to determine the date of enrollment.

- **Residency**— The Residency Form was found to be incomplete or missing.

- **Special Education**— A student was identified in the Enrollment Data as being a special education student, but no IEP was available for review or the weekly service hours did not agree with SETS.

- **English Proficiency**— A difference was noted between the English proficiency level carried in the Enrollment Data and the information taken from the Language Minority Student Enrollment Report.

In addition to the report, we gave the principals instructions on the documentation to resolve each type of discrepancy and allowed them two weeks to provide the documentation. We reviewed the documentation provided and adjusted the census results accordingly.

Process Review

In conducting the SY 2002-2003 census-type audit, TCBA reviewed the membership counting methodology used by DCPS. We reviewed the findings and recommendations presented in the 2001-2002 audit report, identified which recommendations had been implemented, and determined which findings and recommendations were still valid. In the course of discussions with staff from individual schools and school district personnel, we also identified new findings, which could alter the membership counts.

The methodology used to perform the process review for SY 2002-2003 was as follows:

- Findings and recommendations from the previous report were reviewed.

- Policies and procedures for DCPS schools were reviewed.

- An interview protocol was developed which included findings and recommendations from previous reviews.

- Interviews were conducted with DCPS personnel from select schools, Management Information Services, Office of Residency, and Special Education.

- Information gathered was used to validate prior year findings; develop new findings; and identify which recommendations were implemented, which recommendations were still valid, which recommendations were no longer valid, and any new recommendations that should be added.

- Since team members were also conducting actual membership counts, any additional information on procedures, findings, and recommendations was used to add to or support the results from the interviews.

In order to understand and evaluate the effectiveness of the current processes, we incorporated the following review techniques:

- **Interviewing**
  Interviews with DCPS staff to discuss the enrollment, attendance, SIS updating and monitoring processes and procedures. We conducted interviews with SIS administrators, DCPS Information Systems personnel, and DCPS staff.

- **Analytical Review**
  The October 8, 2002, Enrollment Data was analyzed for logic patterns, inconsistencies, duplications, etc.

- **Audit correlation**
  We correlated the information obtained during the audit of the membership count with information gathered during the above processes.

Observations

Residency

Verifying residency continues to be an issue in the District. The DCPS Office of the Superintendent issued a directive dated May 25, 2001, that schools are not to keep copies of the residency proofs; therefore, the audit process was limited to determining if the school had completed the required form. However, the fact that a completed form is on file does not guarantee that valid proof was provided. After the initial review, we gave the principals an opportunity to provide the proof of residency for students for whom the Residency Forms were incomplete. In reviewing the documentation provided, we found that the residency requirements are not being strictly adhered to. For instance, when accepting leases and utility bills as proof of residency, the cancelled checks or receipt of payment are often not included. The DCPS Residency Office estimated that they investigate an average of 200 cases per year, one-third of whom are found not to be residents. Further, we identified 140 students with addresses other than the District, 77 of whom had completed Residency Forms indicating District residency. These issues are discussed in more detail below.

Proof of Residency Missing for Some Enrolled Students
Of the 64,272 students included in TCBA's enrollment count of students in pre-school, pre-kindergarten, kindergarten, grades 1-12, and non-grade level programs in DCPS, the residency status of 903 students was classified as "not verified" or non-resident not paying tuition. In some cases, Residency Forms were on file but missing vital information, such as the check-off for the required proof or the school official's signature. Students for whom adequate documentation was not provided during the resolution process remained as "Not Verified". Table 3 compares the 903 students for whom proof of residency was inadequate to the residency verification code in SIS, highlighting the integrity concerns with SIS data.

Table 3: **Comparison of Unverified Residency to SIS**

Residency Code in SIS	No Residency Form	Form Incomplete	Nonresident	Total
R	291	479	2	772
X	8	4		12
E	1			1
P	1	11		12
Blank	101	5		106
TOTAL	402	499	2	903

SIS not Used as a Resource for Identifying Nonresident Students

The DCPS Residency Office does not use SIS as a tool for identifying potential nonresident students. In analyzing the SIS data that we were provided by DCPS, we identified 140 students whose addresses were other than in the District, *e.g.* Virginia and Maryland; however, our review of the Residency Forms for these students break down as follows:

Residency Form	Number of Students
Non-Resident	52
Resident	77
Resident-Waiver	1
Form Missing	7
Form Incomplete	3
TOTAL	140

The fact that 77 students with completed Residency Forms have addresses in SIS showing that they live outside of the District raises concern about the integrity of the residency verification process. The students should be investigated by the DCPS Residency Office.

Policy Not Adhered to for Withdrawing Students

The guidelines require that students for whom the required proofs of residency are not obtained prior to the official membership date, or within 10 days after the enrollment date, be withdrawn from school and excluded from the count. We found that some schools changed these students to inactive status in SIS, thereby excluding them from the count, but allowing them to remain in class. These students were added to the enrollment conducted by TCBA. Others schools simply ignored the policy and included the students in the enrollment count.

According to the DCPS Student Residency Office, an average of 200 students are investigated each year with one-third eventually identified as non-residents. This shows that there are still loopholes in the current policy.

Residency Requirements Not Strictly Adhered to

The established rules for proving residency require that cancelled checks or receipts be obtained when using a lease or utility bill as proof of residency. In cases where we reviewed copies of the proofs of residency during the resolution process, we found that the cancelled checks or receipts were not usually included.

Non-Resident Students

There are 57 students who are paying non-resident tuition. However, 2 of these 57 had Residency Forms on file indicating that the required proof of District residency had been provided even though the address on the Annual Student Enrollment Form was other than the District. Because the two students are paying tuition, the completed Residency Forms suggest improper form completion rather than violation of the residency policy. In addition, two students paying tuition were not included in the SIS download we received on October 8, 2002, and were not present for the count. Therefore, even though they are paying tuition, they have not been added to the enrollment. Table 4 is a summary of the tuition assessments for the 57 identified nonresident students.

Table 4: **Tuition Assessments**

Grade	Number of Students	Tuition Assessed
Pre-Kindergarten	2	$13,704
First	1	6,203
Second	3	18,609
Third	2	12,406
Fifth	3	18,609
Sixth	1	5,907
Eighth	1	5,907
Ninth	20	153,580
Tenth	12	92,148
Eleventh	9	69,111
Twelfth	3	23,887
TOTAL	57	$420,071

Attendance

Students Absent on the Day of the Count

Absenteeism continues to be high in some of the schools despite marked improvements in procedures for taking attendance over the years. We modified the procedure this year to hold tardy students in a central location so that we could include them in the count. This change reduced the number of students recorded as absent. However, absenteeism was high at some schools. DCPS policy is to withdraw any student who is absent for 20 consecutive days. Our findings indicate that this policy was not always complied with.

Table 5 summarizes the absentee rate for schools on the day that we performed the student counts.

Table 5: **Absenteeism Rates**

School Type	Total in Enrollment Data	Absent on Day of the Count	Percentage
Alternative	200	60	30%
Elementary	41,080	4,073	10%
Junior High	5,173	660	13%
Middle School	4,892	631	13%
Senior High	12,584	3,321	26%
Special Education	1,030	237	23%
TOTAL DCPS	64,959	8,982	13.83%

Note: Absentee rates are based on the Enrollment Data as provided rather than the final census totals.

Table 6 highlights schools with particularly high absentee rates.

Table 6: **Significant Absenteeism Rates by School**

School Type	Total in Enrollment Data	Absent on Day of the Count	Percentage
Oak Hill Academy	152	42	28%
Drew	313	71	23%
Langdon	387	83	21%
Randle Highlands	479	109	23%
Shadd	191	43	23%
Slowe	471	119	25%
Winston EC	555	216	39%
Terrell JHS	294	94	32%
Evans Middle	259	58	22%
Johnson Jr. High	646	148	23%
Anacostia SHS	693	224	32%
Ballou SHS	964	280	29%
Ballou Stay	538	306	57%
Cardoza	749	174	23%
Coolidge	843	252	30%
Eastern	968	270	28%
Moore Academy	264	144	55%
Roosevelt Stay	268	204	77%
Spingarn	609	166	27%
Washington MM	329	98	30%
Woodson	788	233	30%
DC Learning	33	18	55%

Attendance Exception Based
SIS tracks attendance on an exception basis, that is, only days when a student is other than "Present" are captured in SIS. Therefore, if a student has perfect attendance, the SIS attendance screen will be blank. This does not provide the schools with adequate information to monitor attendance. For instance, the same blank screen could indicate that the student was never included on any attendance rosters (not assigned a homeroom) or that the student was a "no-show". Accuracy of SIS attendance data is absolutely necessary in determining whether a student is actually enrolled at a given school. This can be seen most clearly when

looking at duplicate records. The combined Enrollment Data provided by DCPS and the public charter schools contained the following (not mutually exclusive):

- 4,694 students with matching names, *i.e.,* at least 2 students have exactly the same name;
- 607 students with matching student ID numbers;
- 80 students with matching student ID numbers within SIS (eliminated before upload)
- 674 students with a combination of matching name and grade
- 152 students with a combination of matching name and date of birth
- 124 students with a combination of matching name and student identification number
- 4 students enrolled at both DCPS and Tuition Grant schools
- 7 students enrolled at both a public charter school and a Tuition Grant school
- 9 students enrolled at two different Tuition Grant Schools

In conducting the census, we had to determine, to the extent possible, those students from the above populations who were in fact the same student being shown as enrolled at two different schools. The attendance records are the primary source for making that determination. However, because the attendance records are exception based and not always maintained on a daily basis, it is possible for students to appear to be attending two different schools.

Attendance Not Recorded Daily
In researching how a student can appear to be in attendance at two different schools, we were told that schools may not record attendance in SIS daily. Because of scanner failures, SIS being down, or workload, the attendance sheets may not be input. Therefore, because SIS records attendance on an exception basis, all students would appear to be present on days when no information is input. There are also several schools that do not record attendance in SIS.

Students not Withdrawn for Excessive Absence
Aside from the role that attendance monitoring plays in student performance, there are funding issues. DCPS policy requires that students absent for 20 consecutive days be withdrawn. This policy is not enforced because, in part, SIS may not be providing a true record of absences. Students are being carried in enrollment who have actually transferred to other schools. Of the 8,982 students absent on the day of the count, we determined that 173 were not attending on October 8th. While this would be detected in SIS if they transferred to another DCPS school (a duplicate record would be created), there is no means for detecting students who transferred to a public charter school or a school outside of the District. There were originally 40 pairs of students with duplicate records in SIS; we eliminated all but four pairs prior to uploading the data. When we combined the SIS records with the enrollment rosters provided by the public charter schools, we identified an additional 110 pairs of students listed as enrolled in both DCPS and public charter schools or two charter schools. One student was listed as enrolled in three schools.

We recommend that DCPS investigate a more effective means for gathering attendance information. Recording attendance every day rather than on the exception basis will provide better information for attendance monitoring and enrollment. Also, DCPS could expand the use of student ID cards to make attendance and enrollment data more accurate and efficiently obtained. Since ID cards are barcoded, they can be used to scan attendance and enrollment. This is currently being done with great success at Moore Academy.

Non-DCPS Day and Residential Programs (Tuition Grant)

Students with special needs who have been placed in schools outside of DCPS, including day and residential programs and surrounding counties, for whom tuition is paid by DCPS are referred to as Tuition Grant students. Using school information provided by the DCPS Division of Special Education, we sent letters to each of the non-DCPS schools requesting enrollment information as of October 8, 2002. Table 7 summarizes the results.

Table 7: **Tuition Grant Confirmation Results**

	Per SIS	Confirmed Count
Confirmations Received		
— Agrees to SIS	2,372	2,372
— Does Not Agree to SIS	88	
— Additional Students		63
— Duplicates*	(4)	(15)
Confirmations Not Received	107	
Total Tuition Grants Students Reported	2,563	2,420
— Federally Funded**	(75)	—
Total Tuition Grants Students	2,488	2,420

There were 4 duplicates in SIS data showing students at both a DCPS school and a non-DCPS school in addition to 6 students found at a public charter school. Of these 10, 6 were counted as enrolled in both locations. The confirmation results also revealed 9 students identified as being enrolled at a different non-DCPS school.

** *75 students attending Kendall-Gallaudet and Kendall Green are federally funded, so should not be included in the number reported for students in non-DCPS schools for which DCPS is paying tuition.*

The results of the confirmation process highlight a significant improvement in the maintenance of data for Tuition Grant students; however, we documented discrepancies between the DCPS records and the individual schools. TCBA sent confirmation requests to 355 schools servicing a total of 2,567 students. Although we made repeated requests, both in writing and by telephone, we did not receive responses from schools representing 107 students included in the Membership Report. For the confirmations received, we compared each student reported as attending that school to the student data in SIS. We reviewed the discrepancies with the DCPS Special Education Division and obtained documents to resolve the differences. There were 88 students in SIS that did not appear on the confirmations received from the assigned school. Conversely, there were 63 students listed on the confirmations that DCPS agrees were not in SIS but are enrolled. There were also another 121 students shown on confirms who were not in SIS; however, these students may not be special education students or funded by DCPS, so they were not added to the count. Included in the documentation provided by DCPS were invoices supporting the fact that schools billed for students not in SIS/SETS. Therefore, there is a possibility that DCPS may be being billed for students for whom they do not have records of placement. The DCPS Division of Special Education has been working to

clean up the SIS and SETS records and reconcile the results with the enrollment rosters we received from the schools. That process is ongoing.

These issues are not merely a matter of data tracking. They impact all of the following:

- **Fiscal —**
  DCPS may be paying for students who have not been properly placed or have withdrawn from school. The confirmation results indicated that the schools have students enrolled who are not recorded as well as students in SIS and SETS who may not be attending the schools. The number of discrepancies noted suggests that the billings from the schools are not being reconciled to the records maintained by DCPS Special Education Office. We also found that some of the discrepancies are caused by students being carried in SETS because DCPS is responsible for providing services for the students, even though DCPS is not responsible for the tuition.

- **Operational —**
  DCPS records of student placements do not appear accurate. We understand that there can be frequent movement of students among schools, but practices must be in place to track these movements both from a logistics standpoint and to ensure that the movement is in the best interest of the child.

- **Strategic —**
  Special education costs are one of the major components of the DCPS budget. As DCPS moves forward with developing strategic plans to reduce the costs and improve performance, an accurate counting of student placement and related cost is critical, including those students for whom DCPS provides services but does not fund.

The Tuition Grant enrollment includes special education students placed in foster care in surrounding counties who are attending county schools. There are also regular education students in foster care attending surrounding county schools. Information for those students was not available.

Special Education

The DCPS Special Education Division has made substantial progress in updating the data in SETS. However, there continue to be errors. Because SETS is the system of record for special education, we obtained a download of the active students in SETS at October 8th. We merged it into the SIS data by matching student identification number and school. The following was noted in the SETS data:

- There were **488** students in SETS without a matching record in SIS
- **72 of the 488** were shown in SETS as attending a different school than shown in SIS
- The remaining **416** students were inactive and incorrectly shown as "active" in SETS.
- **122** students had a funding level but no service hours
- **998** students in separate special education schools had a funding level other than level 4
- **612** students had weekly service hours greater than 32

Under the Uniform Per Student Funding Formula, the funding level for special education is based on weekly service hours:

Funding Level	Weekly Service Hours
Level 1	*Less than 6 hours*
Level 2	*7 - 15 hours*
Level 3	*More than 15 hours*
Level 4	*Separate school*
Level 5	*Residential*

The funding level in SETS is programmed as a calculation based on the formula. However, the calculation does not differentiate between regular schools and special education schools. Therefore, all students receiving more than 15 weekly service hours are categorized as level 3.

In reviewing the IEPs, we noted numerous errors and inconsistencies in the calculation of special education service hours. These errors can be classified in two categories:

1. Mathematical errors

2. Procedural inconsistencies

Mathematical errors included:

- Converting minutes to fractional hours. For example, recording 45 minutes as .45 hours rather than .75 hours.
- Converting daily service time to weekly
- Converting minutes to hours
- Adding totals

Procedural inconsistencies were:

- Including or excluding lunch
- Including or excluding special education provided in a general education setting
- Including or excluding counseling

We observed during the resolution process that several discrepancies were corrected on subsequent copies of IEPs provided to us, without a new evaluation being conducted on the student. This could be either to ensure that the IEP and SETS hours matched or to correct the mathematical errors on the actual IEPs. To the best of our understanding, information on IEPs should be changed only when a reevaluation has been performed.

We recommend that:

- Training be provided which will instruct appropriate personnel on the proper procedures for preparing and approving an IEP;

- The funding level calculation in SETS be modified to reflect Level 4 students; and

- The funding formula be reviewed to determine if the level definitions require adjustment, such as eliminating the gap between level 1 and level 2.

Systems Maintenance

Prior Student Membership Audit Findings

Since DCPS has not yet implemented the new SIS, the anticipated solutions to multiple gaps in information and procedures have yet to occur. DCPS currently plans to implement a new system called eSIS in 2004 or 2005. The following recommendations from the previous Student Membership audits can be implemented when the new system is in place:

- Creating a new student identifier having up to five fields of student identifying data that must be entered into the student's record will greatly reduce or eliminate duplicate student identifiers and records. Under the current SIS, a student can be entered twice, as long as the school number is different, allowing duplications to occur when a student transfers to another DCPS school.

- SIS has error checking capability on certain fields by notifying the data entry person if the data being entered into a particular field is out of limits or not applicable. Error checking is limited to fields with defined codes, e.g., gender, race, birth date and unique homeroom numbers associated to particular schools. Although the error checking does not ensure that the information being entered is correct, it should ensure the data being entered is within a certain range or an "accepted" value. This is a repeat finding.

- SIS does not track changes made to student data. School staff stated that a method of tracking changes made to student records was desirable. SIS should be able to generate a report or log detailing all changes made to the Student Master Record of the students complete history in DCPS schools e.g. name, address, school, dates, grade/school year and special needs services. This is a repeat finding.

SIS Information Not Up To Date

Several fields in the SIS Student Master Record were not up to date, such as the student status, admission date, transfer date, withdrawal date, previous school and transfer to school code, schedule changed date, residency and special education.

- The admission, withdrawal and transfer dates did not follow a logical sequence. We saw many students with a withdrawal date earlier than the admission date or attendance records after the withdrawal date.

- Schools were inconsistent with the date used as the Admission Date. Some used the date the student enters/starts, the first day of school, the date the application was completed/submitted or the date information is entered into the SIS. Ideally, it should be the date the child started the school year at a particular school, but this is not always the case.

- The student status presented the student as active, although the dates showed the student had obviously transferred or withdrawn.

- In several situations where the student had attended more than one school, both the previous school and transfer school codes were blank.

- Attendance records in several schools were highly unreliable.

- During the Exit Conferences, we requested copies from SIS of both the Student Master and Attendance records. Several schools were uncooperative and failed to provide these records.

- Residency codes are not accurately maintained. The October 8, 2002, SIS data had the following number of students for each residency code:

Table 8: **Number of Students per Residency Code**

SIS Residency Code	Total Students in Enrollment Data Per SIS	Per Audit
R - Resident	64,230	63,745
N - Non-Resident*	55	55
P - Residency Verification Pending 10 Days	66	
E - Extended Beyond 10 Days for Pending	11	
Incomplete Residency Form		601
X - Ward of the State**	350	91
Blank - Has Not Proven Residency	247	467
Total Students per Census	64,959	64,959

*There were 55 students reported in SIS as nonresidents, all of which are paying tuition. However, of these 55, two had completed Residency Forms.

**Depending on how the Residency Form was completed, some state wards may be classified under the Resident category for the audit.

Duplicates may not be Identified

As shown above, there were numerous potential duplicate students based on name, grade, date of birth, and student ID. While MIS runs a duplicate student report, it is based on student ID only, the assumption being that the same student would not have two different IDs. However, we found instances in which we believe this to be the case. For instance, in the download of Tuition Grant students, there were nine students with the same name as another student but different ID numbers, dates of birth, and addresses, indicating that they are different people. However, the DCPS Special Education office informed us that they were, in fact, the same people. We found this same situation between DCPS schools and between DCPS and charter schools. We also found the opposite situation between DCPS and charter schools where the ID numbers were the same but the students were different. Some of the duplicates, or apparent duplicates, can be eliminated by:

- MIS using more care when providing ID numbers for public charter school students. Many of the duplicate ID pairings were students enrolled in both DCPS and a charter school who were

different people but had similar names, indicating that DCPS provided the ID number for the wrong student.

- A periodic review of potential duplicate students based on information other than ID number.

- Coordination between MIS and the individual DCPS schools so that schools are notified when a charter school requests an ID for a current DCPS student, signaling that the student has transferred.

- Requiring public charter schools to obtain DCPS ID numbers. Students transferring to charter schools from schools other than DCPS schools do not always receive a DCPS student ID number. In some cases, students receive a charter school student ID number that is unique to that school. This charter school ID number would not remain with the student if the student transferred to another school. Without a single student ID number, there is a greater opportunity for the double counting of students. This is a repeat recommendation.

Duplicate Students may be Counted in More Than One School
A method does not exist either between public charter schools or between public charter schools and DCPS to check for possible double counted students. Because the public charter schools each use a separate system, automated or manual, to track enrollment, there is not a feasible method for ensuring that students are not counted at both a public charter school and a DCPS school. The enrollment count would not necessarily identify these duplicates because of the policy that a student is to be counted so long as she attended even one day during the last 20 days.

Significant Discrepancies Exist Between SIS and Teachers' Attendance Cards
There were significant discrepancies between the attendance information in SIS and the teachers' attendance cards at several schools. The schools maintained that attendance cards were the source documents used to enter information into SIS, and thus, were reluctant to give us both records. If this is truly the case, no discrepancies should exist. However, there were several instances where critical dates had been altered (either erased and left blank or replaced with tardy) on some attendance cards. Also, in several instances, we received two teachers' attendance cards for the same student with significantly different information. Several schools also provided blank attendance cards for many students.

Data Integrity Concerns for Special Education Students
In the census results, we have reported the total number of students for whom we saw IEPs and for whom we saw evidence of assessment of English proficiency. In comparing the results of our review with the Enrollment Data, numerous discrepancies were noted. For instance, there were 808 students for whom the hours on the IEP did not agree with the SETS data by more than 30 minutes. There were also a significant number of differences less than 30 minutes; however, we considered these to be in agreement for the audit.

Language Proficiency

Improve Identification and Reporting of LEP/NEP Students

As noted above, we found differences between the LEP/NEP code in SIS and the Language Minority Student Enrollment Report issued by the DCPS Office of Bilingual Education (OBE). The following steps should be taken to improve the identification and tracking of LEP/NEP students:

- Ensure that schools are properly trained on and follow policies to identify language minority students and have them tested by OBE;

- Allow OBE better access to SIS to generate reports; and

- Have the language code entered into SIS either by OBE directly or MIS based on OBE reports rather than by the schools.

Administrative Practices

Incomplete Annual Student Enrollment Forms

We observed that the Office section on many Annual Student Enrollment Forms were either incomplete or left totally blank. This section provides critical information on the date of enrollment, special education and residency, and student identification numbers. We also observed that some forms were missing both parent signature and date.

Not all students who withdraw or transfer complete the required forms, as some simply stop attending one school and start at another. The actual day the student started or stopped attending classes at a particular school should be recorded.

Inconsistent Dates

In reviewing the enrollment and residency documentation, we noted inconsistencies in the dates that are used. For instance, the parent may not sign the enrollment form until a date in October, but the school has signed it on a date in September. In order to maintain the integrity of the documentation, all signatures must be made, by school and parent, on the same date. This is a repeat finding.